

Jeff Gleaves - *President*

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- *Treasurer*

Chuck March - *Executive Director*

May 1, 2006

Lori Webber
Environmental Scientist
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Nutrient TMDL for Clear Lake - Lake County Farm Bureau's opposition to reference of the Irrigated Agricultural Lands

Dear Ms. Webber:

Lake County Farm Bureau is extremely concerned with conditions set forth in the Draft Staff Report for the proposed Basin Plan Amendment.

It appears that the Regional Board is unnecessarily melding the Interim Irrigated Lands Waiver (Interim Waiver) as vehicle for the monitoring and reporting of nutrient loading into surface waters flowing into Clear Lake. We are requesting that the references to the Irrigated Agricultural Lands Watershed Group be deleted from the staff report for the reasons set forth below.

First, Agricultural operations subject to the Interim Waiver within the Clear Lake Basin are interspersed with a multitude of other land uses. For instance, it is common to have in one sub area family farms, rural residences with septic tanks, family gardens, aesthetic ponds with high concentrations of wildlife, horse pastures, and other nutrient potential sources. As a practical matter, this makes it financially infeasible and impractical to individually evaluate any potential source contributions from our family farms and ranches. We therefore believe that the monitoring and estimations of load content that will be conducted by the County of Lake will include those irrigated agricultural lands currently enrolled as participants in our watershed group.

Second, in response to the Irrigated Lands Program, Lake County Farm Bureau formed a watershed group consisting of growers located within the Cache Creek Watershed as well as the Upper Putah Creek Watershed with the limited premise of fulfilling its enumerated obligations. We are one of the Sub-watershed groups of the Sacramento Valley Water Quality Coalition. Please see the land use maps (pages 97 -106) in the Watershed Evaluation Report submitted by the Sacramento Valley Water Quality Coalition dated April 1, 2004.

We have major concerns with this type of program being required for our watershed group as a whole. Many of our members do not farm within the drainage of Clear Lake. We would be presented an unworkable program to separate those growers from ones whose operations do flow into the lake. The

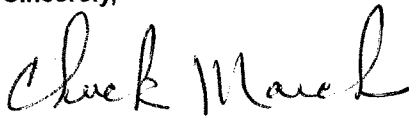
management of such a program would not be economically feasible, as monitoring costs would need to be increased to unbearable levels due to the limited acreages within the different sub-watersheds of the Clear Lake Drainage.

For perspective, Lake County Community Development Department has currently reported that there is approximately 59,451 acres zoned agriculture in Lake County. Department of Water Resources mapping figures approximately 28,000 acres in agriculture. Our watershed group, as well as our Agricultural Commissioner believes there is approximately 15,000 – 18,000 acres in irrigated agriculture. The remaining 44,000 acres of agricultural zoned properties will be included within the County of Lake's program.

Lake County's irrigated agricultural lands are interspersed with many rural residential ranchettes that do not irrigate for the purpose of marketing their commodity. Out of 2027 parcels zoned agriculture, over 600 are 5 acres and less. The majority of these parcels and owners are not currently included in our waiver program, as they do not irrigate a commercial agricultural commodity. We see this proposed implementation program as a penalty for those that have worked to stay in production agriculture.

With this said, Lake County Farm Bureau is more than willing to work within the program under the County of Lake and its role with the Nutrient TMDL and to assist the County in its efforts.

Sincerely,

A handwritten signature in cursive script that reads "Chuck March".

Chuck March
Executive Director

CC:

Pamela Creedon, Executive Officer, Regional Board
David Guy, Sacramento Valley Water Quality Coalition
Anthony Farrington, Chairman, Board of Supervisors, County of Lake
Bob Lossius, Deputy Director, Water Resources, County of Lake
John Hewitt, California Farm Bureau Federation